



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 16, 2014

By Electronic Mail and ECF

Hon. Katherine B. Forrest
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Ross William Ulbricht*, S1 14 Cr. 68 (KBF)

Dear Judge Forrest:

The Government writes in response to the order of the Court, dated December 12, 2014, in which the Court ordered the parties to confer regarding a list of terms likely to arise at trial, and whether there was any likelihood that the parties could reach stipulations as to definitions. The Government has consulted with counsel for the defendant, and has begun preliminary discussions regarding this issue.

However, given the additional matters that the Court has requested that the Government brief in advance of tomorrow's pretrial conference, the Government respectfully requests additional time to continue discussions with defense counsel regarding stipulations as to definitions of various terms. Accordingly, the Government respectfully requests leave to file a joint list of proposed definitions with the Court by December 19, 2014. The Government has consulted with Joshua Dratel, Esq., counsel for the defendant, who consents to this application.

Respectfully,

PREET BHARARA
United States Attorney

By: /s/ Timothy T. Howard
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Cc: Joshua Dratel, Esq. (by electronic mail)